

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

C.C., as Parent and Legal Guardian of JANE DOE,
a Minor,

Plaintiff,

v

MARCELLUS COMMUNITY SCHOOLS,
MARCELLUS COMMUNITY SCHOOLS
BOARD OF EDUCATION, and individuals
NANETTE PAULEY, MELINDA BOHAN,
SARAH BISCHOFF, TAMMY CURTIS,
HENRY ESSEX and ROBERT DIETZEL,
in their individual capacities,

Defendants.

CASE NO. 1:23-cv-00255

HON. PAUL L. MALONEY

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DEFENDANT ROBERT DIETZEL'S EXPERT WITNESS DISCLOSURE

NOW COMES Defendant Robert Dietzel, by and through his attorneys SMITH HAUGHEY RICE & ROEGGE, and for his Expert Witness Disclosure states as follows;

1. Catherine A. Tracey, JD
Miller Johnson
45 Ottawa Avenue SE, Suite 1100
Grand Rapids, MI 49503

Ms. Tracey is an attorney and a Title IX Investigator. It is anticipated she will offer her opinions relating to Mr. Dietzel's investigation. Any opinions offered will be based on her knowledge, training, and professional experience, together with information procured through discovery.

2. Sandra K. Schuster, MS, JD / Daniel Swinton, JD, EDD
TNG Strategic Risk Management Solutions
475 Allendale Road, Suite 200
King of Prussia, PA 19406

Ms. Schuster is an attorney and a Title IX Investigator. It is anticipated she will offer her opinions relating to Mr. Dietzel's investigation. Any opinions offered will be based on her knowledge, training, and professional experience, together with information procured through discovery.

3. David Wolowitz, MR
Wolowitz JD Consulting, LLC
100 Waters Edge
Greenland, NH 03840

Mr. Wolowitz is an attorney who specializes in education law in general, and Title IX in particular. It is anticipated he will offer his opinions relating to Mr. Dietzel's investigation. Any opinions offered will be based upon his knowledge, training, and professional experience, together with information procured through discovery.

4. Andrew Nay, Ph.D., CRC, CDMS
Assistant Professor
Office of Rehabilitation and Disability Studies
Department of Counseling, Educational Psychology and Special Education
Michigan State University
620 Farm Lane, Room 458
East Lansing, MI 48824

Dr. Nay is an expert in vocational rehabilitation. It is anticipated that he will offer his opinions relating any vocational rehabilitation issues concerning Plaintiff. Any opinions offered will be based on his knowledge, training, and professional experience, together with information procured through discovery.

5. Dr. Paul Sicilian
Grand Valley State University
3136 L. William Seidman Center
Grand Rapids, MI 49503.

Dr. Sicilian is an expert Economist. It is anticipated he will offer his opinions relating to the Plaintiff's loss of wages and economic impact on family members. Any opinions offered will be based upon his knowledge, training, and professional experience, together with information procured through discovery.

6. Any and all experts named by any other party to this action.
7. Any and all necessary rebuttal expert witnesses.
8. Defendant Robert Dietzel reserves the right to amend this disclosure as may become necessary through further discovery.

Date: April 19, 2024

By: /s/ Michael D. Wiese (P78353)

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